

**IN THE UNITED STATES DISTRICT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a	)	
ADAMSWELLS; and CONSOLIDATED	)	
TELEPHONE COMPANY d/b/a CTC	)	
	)	
Plaintiffs,	)	No. 1:19-cv-07190
	)	
vs.	)	Judge John Z. Lee
	)	Magistrate Judge Jeffrey T. Gilbert
T-MOBILE USA, INC.; and	)	
INTELIQUENT, INC.	)	
	)	
Defendants.	)	

**JOINT MOTION TO RESOLVE DISCOVERY DISPUTE**

Defendant T-Mobile USA, Inc. (“TMUS”) respectfully submits this joint motion to resolve the parties’ discovery dispute. TMUS requests a protective order requiring Plaintiffs Craigville Telephone Co. d/b/a AdamsWells and Consolidated Telephone Company d/b/a CTC (together, “Plaintiffs”) to seek TMUS’s advance written consent or leave of Court before using personally identifiable information produced to Plaintiffs in discovery to contact any current or former TMUS customer. Plaintiffs oppose TMUS’s request and request oral argument on this joint motion. In accordance with Magistrate Judge Gilbert’s September 15, 2021 Order (ECF No. 158) and preference for joint briefs concerning discovery disputes, the accompanying joint brief sets forth both the grounds for this motion as well as Plaintiffs’ opposition thereto.

This motion complies with Local Rule 37.2. The parties met and conferred via telephone on September 13, 2021 at 3pm Eastern but were unable to resolve the dispute. Cathy Hinger and Kurt Weaver participated on behalf of Plaintiffs, Michael Mervis and Tiffany Woo participated on behalf of TMUS, and Joe Carey participated on behalf of Defendant Inteliquent, Inc.

WHEREFORE, the parties request that this Court consider this joint motion.

Dated: October 20, 2021

Respectfully submitted,

/s/ Nigel F. Telman

Nigel F. Telman  
PROSKAUER ROSE LLP  
Three First National Plaza  
70 West Madison, Suite 3800  
Chicago, IL 60602  
(312) 962-3550  
(312) 962-3551 (fax)  
ntelman@proskauer.com

Bradley I. Ruskin (admitted *pro hac vice*)  
Michael T. Mervis (admitted *pro hac vice*)  
Baldassare Vinti (admitted *pro hac vice*)  
PROSKAUER ROSE LLP  
11 Times Square  
New York, New York 10036  
(212) 969-3249  
(212) 969-2900  
bruskin@proskauer.com  
mmervis@proskauer.com  
bvinti@proskauer.com

*Attorneys for T-Mobile USA, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned attorney, on oath, certifies that on October 20, 2021 he served the foregoing **Joint Motion to Resolve Discovery Dispute** via the ECF system to all parties that have consented to same in accordance with applicable Federal Rules of Civil Procedure and Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ Nigel F. Telman  
Nigel F. Telman